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June 17, 2020

The Board of the Michigan Association of Colleges for Teacher Education (MACTE) opposes SB 657. The Michigan Association of Colleges for Teacher Education represents public and independent educator preparation programs from across Michigan and is the State chapter of the American Association of Colleges for Teacher Education.

SB 657 lessens requirements for the preparation of teachers who teach students with special needs and is not necessary. Michigan educator preparation programs have a system in place to allow an individual who holds a general education certificate in any subject-area to complete required coursework while under a year-long permit as a special educator. Our accredited programs have demonstrated time and again that state and national standards are met or exceeded and that Michigan educator preparation institutions can deliver this curriculum in an online format that supports the teacher's work schedule. Experimental programs, accelerated route programs, and residency programs developed by educator preparation programs and local education agencies are proving effective and provide the trusted route to licensure for those teaching our most vulnerable populations of students. We echo the concerns of our members. The following is a bulleted list of concerns voiced by our members. This is neither comprehensive nor complete. We are willing to testify to supply additional information if needed.

- **Classroom experiences are not sufficient in SB 657:** Research shows that rich diverse clinical experience is essential to developing good teachers. The Michigan Department of Education (MDE) requires such in their [clinical experience rule](#)<sup>i</sup> (600 hours of diverse experiences), our accrediting body (CAEP) requires the same rich [clinical experiences](#)<sup>ii</sup> and best practices demands breadth and depth of clinical experiences, which guide educator preparation programs. A single experience is sufficient.
- **Does not prepare teachers for all responsibilities of the endorsement:** Special Education teachers can teach in the category in which they are endorsed and they can teach in a resource room working with all students with a variety of types of special needs per [MDE rule](#)<sup>iii</sup>. The expectation is that a special education teacher endorsed in one category is able to teach in a resource room with students falling into a variety of categories. Therefore, approved programs must prepare candidates to meet all children's needs. This program, with its single clinical experience, does not meet that criteria.
- **After 5 years the teacher will have a standard certificate without the background required for the certificate:** The law allows teachers to get the standard certificate

without the breadth of experience that is required per rule. A school hiring such a person might not be aware of this limitation and put the teacher in a placement for which they are not prepared. This is particularly problematic with the vulnerable population of students.

- **Credit hours (or equivalent) definition is inconsistent with the field:** The bill equates 1 credit hour with 7 hours of instruction which is too low. A typical university equivalent would be 1 credit hour = (minimally) 12.5 meeting hours (with a minimum 25 hours of work outside of class). Per MDE, 25 hours (State Continuation Clock Hours (SCECHs) - contact hours) = 1 credit hour.
- **MDE doesn't have the capacity to adequately monitor the quality of programs for "equivalent" credits:** Universities are accredited both through national university accrediting bodies (ie. Higher Learning Commission) and educator preparation accrediting bodies (ie. CAEP). A credit hour and the courses they represent are held to accrediting bodies high standards. MDE would need to monitor "equivalent" credits.
- **Standards written into law are problematic:** Putting standards into law is problematic in that research over time might identify better practices. Thus laws should point to MDE rules that can be adapted when things are learned, particularly from experimental programs discussed below. However, when the law is removing the requirements to follow rules, including standards becomes essential. This paradox is neither good for policy nor good for children.
- **The law is unnecessary - experimental programs could meet the same need:** MDE's experimental programs route allows approved programs to create pathways that meet MARSE requirement 30 credits, while waiving other rules and testing the impact on teachers and children. Institutions like Wayne State University, Eastern Michigan University, Saginaw Valley State University and others have successfully implemented such programs. The advantage is the changes can be evaluated and adapted to meet the needs of children.
- **The proposed law for general education certified teachers is unclear and unnecessary:** Certified teachers are not required to complete the 32 hours in lieu of a yet defined "accelerated program." It is unclear what requirements the teacher would need to meet. This is also unnecessary. MDE already has an option for such people to become special education teachers, working as special education teachers while enrolled in an approved program through the [Temporary Teacher Approval](#) program.

These are just a few of our concerns. Overall, we believe that this legislation is not fixing any problem and is actually increasing the probability that our most vulnerable children will be underserved. The system has mechanisms to address these issues, while maintaining high quality programs and preparation. We urge you to vote against this bill.

Sincerely,

Dr. Beth Kubitskey, President MACTE (EMU)  
Dr. Betty Kirby, President emeritus (CMU)  
Dr. Anne Tapp, President emeritus (SVSU)  
Dr. Sally Rae, Past President (Siena Heights University)

Dr. Caryn King, Board Member (GSVU)  
Dr. Karen Obsniuk, Board Member (Madonna University)  
Dr. Joe Lubig, Board Member (NMU)

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[i] “In alignment with national accreditation expectations, and to build candidate competence and marketability, it is expected that all programs provide a sequential set of supported opportunities to work with, reflect upon, and support the needs of a diverse student population. A clinically based teacher preparation program should be designed so that candidates complete an intentional, meaningful series of diverse, cohesive, clinical experiences integrated with the preparation curriculum. These should occur in multiple settings that provide teacher candidates opportunities to work with learners who represent the cultural, linguistic, and socioeconomic diversity of Michigan’s diverse communities, including students who come from underrepresented or marginalized populations.” (MDE Clinical Requirements, 2019, p5)

[ii] “CAEP Component 2.3--The provider works with partners to design clinical experiences of sufficient depth, breadth, diversity, coherence, and duration to ensure that candidates demonstrate their developing effectiveness and positive impact on all students’ learning and development. Clinical experiences, including technology-enhanced learning opportunities, are structured to have multiple performance-based assessments at key points within the program to demonstrate candidates’ development of the knowledge, skills, and professional dispositions, as delineated in Standard 1, that are associated with a positive impact on the learning and development of all P- 12 students.” (CAEP Handbook, 2019, p 102).

[iii] “Any teacher who is assigned to a **special education program** must have an endorsement that matches that program. For example, a program for students with cognitive impairment must be taught by a teacher with the Cognitive Impairment (SA) endorsement on their teaching certificate.

Teachers assigned to a **resource program** may hold **any** special education endorsement. The only exceptions are for teachers whose only special endorsement is the Physical Education for Students with Disabilities (SP) or the Early Childhood-General and Special Education (ZS) endorsement.

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